

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

EMG TECHNOLOGY, LLC,

Plaintiff,

v.

CHRYSLER GROUP LLC,

Defendant.

Case No. 6:12-cv-00259-MHS (Lead Case)

JURY TRIAL DEMANDED

JOINT MOTION FOR STIPULATED DISMISSAL

The Plaintiff, EMG Technology, LLC (“EMG”) and defendant Chrysler Group LLC, pursuant to Fed. R. Civ. P. 41(a), hereby move for an order dismissing all claims EMG asserted and all claims EMG could have asserted against Chrysler Group LLC, including any entity it owns or controls or that owns or controls it, (“Chrysler”) in this action **WITH PREJUDICE**. EMG and Chrysler hereby agree and stipulate as follows:

- (1) Each party bears its own costs, expenses, and attorneys fees;
- (2) EMG covenants not to sue or assert against Chrysler any claim for infringement of any existing or future claims of any patents or patent applications that EMG owns or otherwise has the right to assert; and
- (3) EMG represents and covenants that it has not transferred any cause of action or right to sue Chrysler to any third party and will not transfer any cause of action or right to sue Chrysler to any third party.

By: /s/Charles Ainsworth

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By: /s/ Frank C. Cimino with permission

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**ATTORNEYS FOR DEFENDANT,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 12, 2013.

/s/ Charles Ainsworth
Charles Ainsworth